

## CSD Talking Points

### Intro

- Central Sands Dairy, LLC is located in the Central Sands Region of Wisconsin which is comprised of sandstone aquifers and sandy top soil. These conditions create an area with increased ground infiltration. Groundwater flow from this area flows in a southeasterly direction into Petenwell Lake, a man-made flowage lake of the Wisconsin River. Petenwell Lake is impaired for Total Phosphorus and experiences extensive blue-green algal blooms.
- In 2012, Ex. 6 Personal Privacy (PP) of Companies (Owners/Operators of Central Sands Dairy) submitted an application to build another CAFO, Golden Sands Dairy, LLC, approximately 27 miles Northeast of Central Sands Dairy, LLC in Saratoga, Wisconsin.
- September of 2012, Kenneth Wade P.E., P.G was hired by a citizen in the area to evaluate CSD's nutrient management plan and CSD's operation. The report highlighted the increasing level of nitrate contamination in the private drinking water wells surrounding both the facility and the manure land application fields.
- Central Sands Dairy, The Wisconsin Department of Natural Resources, the Wisconsin Department of Agriculture, Trade and Consumer Protection, and Region 5 EPA have been involved in aspects of investigating the drinking water, ground water and surface water for pesticides, bacteria, nitrate, etc.

### Issues

- **Private Drinking water well contamination.** The Public Water System nitrate MCL of 10 mg/L of nitrate-nitrite is used as a reference level for these wells.
  - Since at least 2014, the Wisconsin Department of Agriculture, Trade and Consumer Protection has tested private wells and transmitted the results to citizens along with letters stating that "... DHS recommends that all people avoid long-term consumption of water having nitrate concentrations greater than 10 mg/L."
  - In October of 2017, EPA sampling found 5 five private wells of the 15 sampled that had results >20 mg/L. Note that this sampling event was based on the location of historically used land application fields but was not coordinated with planned land application.
- **WDNR's Authority:**
  - WDNR has not been able to use their well compensation program to assist the residents in the Central Sands area with high nitrate levels.
  - WDNR has not been able to take enforcement on Central Sands Dairy, LLC for nitrate exceedances of 10 mg/L in their monitoring wells located on the production area. Central Sands Dairy, LLC argues that it could be due to an up-gradient source.
  - WDNR has not taken enforcement for potential permit violations of failing to comply with its nutrient management plan.
- **R5 EPA's Inspection of Central Sands Dairy Production Area and Nutrient Management Plan Review:**
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## **Ex. 5 Deliberative Process (DP)**

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## **Ex. 5 Deliberative Process (DP)**

### **Solution**

## **Ex. 5 Deliberative Process (DP)**

- Citizens have received letters from Department of Agricultural, Trade and Consumer Protection not to drink their water if their test results for nitrates exceed 10 mg/L.
- Citizen's home values in the area continue to decrease due to the contamination of their private wells.
- Groundwater in the Central Sands Area flows to Petenwell Lake, a sport and recreational Lake, which is currently on the 303d list for total phosphors and experiences high levels of blue-green algal blooms.
- WDNR's requirements in the permit to add monitoring wells around the production area have not addressed the nitrate groundwater contamination.